

February 5, 2004

Mark B. McClellan, M.D., Ph.D. Commissioner of Food and Drugs Food and Drug Administration 5600 Fishers Lane Rockville, MD 20857

Dear Dr. McClellan,

The final decision regarding the availability of over-the-counter "emergency contraception" pills rests on your shoulders. In your deliberations, I hope you will consider these items of scientific data.

- The drug can act as an abortifacient, depending on when in a woman's (or teenage girl's) cycle they are taken.
- The drug carries a significant risk of ectopic pregnancy.
- Over-the-counter availability will allow these drugs to be used routinely, despite the fact that they are contraindicated for such use.
- The potential for misuse of "emergency contraception" is especially grave in the case of minors. Making the pills available over-the-counter could increase sexual risk-taking behaviors among young girls, and eliminates physician and parental oversight.
- Over-the-counter availability of "emergency contraception" would likely increase the pressure already being placed on pharmacies and pharmacists to violate their conscience.
- Availability of "emergency contraception" is not likely to reduce abortions.

The availability of this "emergency contraception" pill is not necessary for the protection of the public health. It has potential for toxicity and for other physical and psychologically harmful effects. It is not safe for use in self-medication. Please do not allow these drugs to be made available over-the-counter.

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Sincerely,

Bill Klatt

Coordinator, Pro-Life Office

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